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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RICKY BUTLER, an individual,

Case No. 5:23-cv-02147 RGK (Ex)

Plaintiff,

**NOTICE OF SETTLEMENT AND
REQUEST TO VACATE ALL DATES**

Before the Honorable R. Gary Klausner

COUNTY OF SAN BERNARDINO,
DEPUTY GUYON FOXWELL and
DOES 1 through 10, inclusive,

Defendants.

**TO THIS HONORABLE COURT AND TO ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that the parties have reached a settlement in this matter, which will resolve this entire action.

The settlement is between Plaintiff and Defendants, including San Bernardino County, whose Board of Supervisors approved the settlement on September 10, 2024. The parties are executing the settlement documents. Counsel for the parties estimate that it will take approximately 30 days to issue payment pursuant to the settlement agreement.

The entire case shall be dismissed with prejudice upon the execution of the settlement agreement. The parties shall file a Joint Stipulation to dismiss all claims within thirty (30) days. Accordingly, the parties, by and through their counsel of record, respectfully request that the Court vacate all pending dates. The parties request that the Court retain jurisdiction over this matter until the settlement agreement is executed and the parties file a formal stipulation of dismissal.

Respectfully submitted,

DATED: September 11, 2024

PLC LAW GROUP, APC

/s/ Na'Shaun L. Neal

Peter L. Carr, IV

Na'Shaun L. Neal

Lauren McRae

Attorneys for Plaintiff, Ricky Butler

DATED: September 11, 2024

TOM BUNTON

County Counsel

/s/ Adam Miederhoff

ADAM MIEDERHOFF

Deputy County Counsel

Attorneys for Defendants,

San Bernardino County and Guyon Foxwell

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2 **SIGNATURE CERTIFICATION**
3

4 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies &
5 Procedures Manual, I hereby certify that the contents of this document
6 are acceptable to Adam Miederhoff, counsel for Defendants, and that I have
7 obtained her authorization to affix her electric signature to this document.

8 Dated: September 11, 2024
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10 /s/Na’Shaun L. Neal
11 Na’Shaun L. Neal
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